

RAPID RAIL SYSTEMS

November 16, 1988

Mr. Frank Feffer
Chemonics Industries
734 E. Southern Pacific Dr.
Phoenix, AZ 85034

Dear Mr. Feffer:

The following is a description of Government Innovators, Inc. dba Rapid Rail Sysrms, including historical and present operations:

The history of Government Innovators, Inc. includes the first sale of a truck in 1974. We contracted all of the manufacturing until our own manufacturing began in 1981. During that year, eight trucks were produced; therefore, hazardous waste production would have been minimal. Since 1984, production has roughly doubled each year, and waste generation has increased at approximately the same rate.

Government Innovators, Inc. fabricates mechanized refuse collection trucks, including both the compacting truck bodies and the automated loaders. Government Innovators, Inc. manufactures most of the parts for these units on the premises.

Operations include machining, welding and assembly of all of the parts. The finished trucks are painted in a commercial paint booth, sized to enclose the largest finished units which are manufactured.

Wastes which might be considered hazardous, and which are generated in the above processes are as follows:

1. Paint
2. Paint reducer
3. Paint solvent -EPA #D001
4. Hydraulic oil (Dexron II Automatic Transmission Fluid identical to that used in all automobiles).
5. Water soluble machining oils (coolants).
6. Parts cleaning solvent (used in two small parts cleaning units). These commercial cleaning units are owned and maintained by Safety-Kleen Company of Elgin, IL. Safety-Kleen picks up the containers of spent solvent and leaves fresh solvent about twice a month.

Most of the hazardous materials are generated from the painting operation when the paint spray equipment is cleaned by rinsing it in solvent. After these liquids are collected, they are run through an electric distilling machine to reclaim the solvents for re-use. The still-bottoms from the distilling operation have been handled exclusively by Southwest Solvents Corp. of Chandler, AZ, and all manifests are on file at Government Innovators' office.

The other major source of liquids is the repair-during-manufacture process which occurs along the assembly line. This is entirely hydraulic oil which "bleeds" off during hose-changes and cylinder-rebuilding. This oil is collected in drain pans and is recycled into our Dexron oil storage tank (being carefully filtered as it is pumped back to storage).

Government Innovators, Inc. also purchases diesel fuel in 55-gallon drums, which when empty, are returned to the vendor, and/or refilled.

Since 1986, Government Innovators, Inc. has reported to the state and federal agencies as a hazardous waste generator (U.S. EPA identification number AZD-981673544). Documentation since that time is available and can be provided at your request.

Sincerely,


Marshall Macy
Asst. General Manager

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